

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORCA SECURITY LTD.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 23-758 (JLH)
)	
WIZ, INC.,)	
)	
Defendant.)	

JOINT MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Pursuant to Section 8(g) of the Scheduling Order (D.I. 33, D.I. 90) and Section 3(a)(iii) of the Stipulation and Order Regarding Discovery of Electronically Stored Information (D.I. 71), Plaintiff Orca Security Ltd. and Defendant Wiz, Inc. respectfully move this Court to schedule a teleconference to address the following disputes about electronic discovery.

Plaintiff Orca Security Ltd.'s Issue(s) For Teleconference:

1. Defendant's objections to Orca's proposed ESI search term: (((cloud w/5 (native OR security)) OR platform) w/15 (invest* OR profit* OR fund* OR venture OR market* OR demand OR compet* OR financ* OR revenue* OR sale* OR purchase* OR acqui* OR merg* OR cost* OR startup OR project* OR forecast* OR seed OR "series a" OR "series b" OR margin* OR milestone* OR price* OR pricing OR calculat* OR discount*))

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in one or more verbal meet-and-confers by telephone on the following dates: July 2, 5, 12, 15, and 17, 2024.

Delaware Counsel:

- Orca: Rodger Smith (Morris, Nichols, Arsht & Tunnell);
- Wiz: Christine Haynes, Fred Cottrell, Kelly Farnan, and Gabriela Monasterio (Richards, Layton & Finger)

Lead Counsel:

- Orca: Blake Davis, Chris Henry, Krissy McKenna, Ryan Banks, Lucas Lonergan, Nicole Bruner, and Peter Hoffman (Latham & Watkins);
- Wiz: Caty Lacey, Lisa Zang, Praatika Prasad, and Callie Davidson (Wilson Sonsini)

The parties are available for a teleconference on September 11, 2024 at 3:00 pm ET, i.e., the date and time the Court set for a teleconference to resolve other discovery disputes (D.I. 95), or will otherwise make themselves available at the Court's convenience.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Rodger D. Smith II

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July 19, 2024

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